

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2020-245-E**

In Re:	)	
	)	
Petition of The Electric Cooperatives of	)	<b>PETITION TO INTERVENE</b>
South Carolina to Establish a New Docket	)	<b>ON BEHALF OF</b>
for Purpose of Allowing Electric	)	<b>SOUTH CAROLINA</b>
Cooperatives to Provide Notice of Certain	)	<b>CABLE TELEVISION ASSOCIATION</b>
Contracts as Required by S.C. Code	)	
Ann. § 58-9-3030(C)(1) of the Broadband	)	
Accessibility Act (Act 175 of 2020).	)	
_____	)	

The South Carolina Cable Television Association (“SCCTA”), by its undersigned attorneys, hereby petitions the South Carolina Public Service Commission (the “Commission”), pursuant to 10 S.C. Code Ann. Regs. 103-825, for an order allowing SCCTA to intervene in the above-captioned proceeding with full rights to participate as a party of record. In support of this petition, SCCTA would show the following:

1. SCCTA is a nonprofit corporation, organized and existing pursuant to the laws of the State of South Carolina, whose members joined together to advance the common interests of the cable industry in South Carolina. As applicable to this proceeding, SCCTA represents its interests and the interests of its membership, which is comprised of South Carolina’s major cable companies including Charter Communications, Comcast Cable Communications, and Atlantic Broadband who serve over a million cable households in the state.

2. SCCTA's authorized representatives in this docket are as follows:

Mr. Ray Sharpe  
Executive Director  
South Carolina Cable Television Association  
P.O. Box 2418  
West Columbia, SC 29171-2418  
raysharpe@mysccta.com

Mitchell Willoughby, Esquire  
Andrew J. D'Antoni, Esquire  
Willoughby & Hoefer, P.A.  
P.O. Box 8416  
Columbia, SC 29202  
(803) 252-3300  
mwilloughby@willoughbyhoefer.com  
adantoni@willoughbyhoefer.com  
*Attorneys for SCCTA*

3. On October 12, 2020, The Electric Cooperatives of South Carolina ("ECSC") filed a petition to establish a specific docket for the purpose of permitting electric cooperatives to provide notice of certain contracts required by S.C. Code Ann. § 58-9-3030(C)(1) of the Broadband Accessibility Act (Act 175). The notice filings required under S.C. Code Ann. § 58-9-3030(C)(1) are meant to provide communications service providers with an opportunity to conduct due diligence with regard to such contracts. Consistent therewith, ECSC's petition further requests that communications service providers be permitted to intervene in the above-captioned proceeding for the purpose of receiving such notice. Finally, the petition requests that any complaints submitted under S.C. Code Ann. § 58-9-3030(C)(1) be filed separately in a new docket.

4. Among other services provided by its members, SCCTA members are communications service providers entitled to receive notice of those certain contracts pursuant to S.C. Code Ann. § 58-9-3030(C)(1) and are entitled to file a complaint in connection therewith if such contracts do not conform with said provision. Accordingly, SCCTA has an interest in the

above-captioned proceeding that will be affected by notice filings made in this docket pursuant to S.C. Code Ann. § 58-9-3030(C)(1). SCCTA would, therefore, respectfully request that it be permitted to intervene in the above-captioned proceeding in order to fully participate as a formal party of record.

5. SCCTA has no objections to the relief sought in the ECSC petition in the above-captioned proceeding.

6. SCCTA's intervention is in accordance with S.C. Code Ann. § 58-9-3030(C)(1).

7. SCCTA is informed and believes that granting its request to be made a party of record in the above-captioned proceeding is in the public interest and should be permitted pursuant to S.C. Code Ann. § 58-9-3030(C)(1). Moreover, ECSC's petition expressly requests that the Commission permit communication service providers to intervene in this proceeding.

**WHEREFORE**, SCCTA prays for the following relief:

A. That this petition to intervene be granted by the Commission and that SCCTA be made a formal party of record in the above-captioned proceeding.

B. That SCCTA's authorized representatives identified in paragraph 2 hereinabove receive timely notice of and access to all filings, including notice filings required by S.C. Code Ann. § 58-9-3030(C)(1), made in this docket by electric cooperatives or any other person.

C. That SCCTA be permitted to fully participate in the above-captioned proceeding and take such positions that it deems advisable.

D. That such other and further relief be granted as is just and proper.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

s/Mitchell Willoughby

Mitchell Willoughby, S.C. Bar No. 6161

Andrew J. D'Antoni, S.C. Bar No. 100919

**WILLOUGHBY & HOEFER, P.A.**

930 Richland Street (29201)

P.O. Box 8416

Columbia, SC 29202-8416

(803) 252-3300

mwilloughby@willoughbyhoefer.com

adantoni@willoughbyhoefer.com

October 14, 2020

Columbia, South Carolina